

### **REMARKS**

The Office Action dated October 13, 2006, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 6, 11, 13 and 18 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter has been added. Claims 1-29 are submitted for consideration.

Claims 1-21, 23, 25, 17, and 29 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,868,282 to Carlsson (hereinafter Carlsson). The rejection is traversed as being based on a reference that neither teaches nor suggests the novel combination of features clearly recited in independent claims 1-21, 23, 25, 17 and 29.

Claim 1, upon which claims 2-5 and 22-23 depend, recites a method including connecting a subscriber terminal of a wireless telecommunication system to an infrastructure of the wireless telecommunication system over a wireless interface, the subscriber terminal holding a subscriber identity in the wireless telecommunications system. The method also includes connecting the subscriber terminal to at least one sub-terminal over a proximity wireless interface, the at least one sub-terminal using the subscriber identity of the subscriber terminal. The method also includes requesting a radio link from the subscriber terminal, the radio link being directed from the infrastructure to the at least one sub-terminal and generating signalling parameters for

controlling the radio link. The method further includes communicating at least one of the signalling parameters between the sub-terminal and the infrastructure via the subscriber terminal.

Claim 6, upon which claims 7-10 and 24-25 depend, recites a terminal system including a subscriber terminal and at least one sub-terminal. The subscriber terminal includes a connecting unit configured to connect the subscriber terminal to a infrastructure of a wireless telecommunication system and subscriber an identity unit configured to hold a subscriber identity of the subscriber terminal in the wireless telecommunications system. The at least one sub-terminal uses the subscriber identity of the subscriber terminal and includes a receiving unit configured to provide a radio link directed from the infrastructure to the at least one sub-terminal, the radio link being controlled on the basis of signalling parameters. The subscriber terminal includes a requesting unit connected to the connecting unit, for requesting the radio link. The terminal system includes a signaling unit connected to the connecting unit, for communicating at least one of the signalling parameters between the subscriber terminal and the infrastructure. The terminal system includes proximity a signalling unit connected to the signalling unit, configured to communicate the at least one of the signalling parameters between the subscriber terminal and the at least one sub-terminal over a proximity wireless interface.

Claim 11, upon which claim 12 and 26-27 depend, recites a subscriber terminal of a wireless telecommunications system. The subscriber terminal includes a connecting

unit configured to connect the subscriber terminal to an infrastructure of the wireless telecommunication system and a subscriber identity unit configured to hold a subscriber identity of the subscriber terminal in the wireless telecommunications system. The subscriber terminal also includes a requesting unit connected to the connecting unit, configured to request a radio link directed from the infrastructure to at least one sub-terminal, the at least one sub-terminal using the subscriber identity of the subscriber terminal, the radio link being controlled on the basis of signalling parameters. The subscriber terminal further includes a proximity signalling unit configured to communicate at least one of the signalling parameters with the at least one sub-terminal over a proximity wireless interface and a signalling unit connected to the connecting means and the proximity signalling means, configured to communicate the at least one of the signalling parameters between the subscriber terminal and the infrastructure.

Claim 13, upon which claims 14-17 and 28 depend, recites a sub-terminal including a receiving unit configured to provide a radio link directed from an infrastructure of the wireless telecommunication system to a sub-terminal of the wireless telecommunication system. The sub-terminal is connected to the infrastructure and holds a subscriber identity in the wireless telecommunication system. The sub-terminal uses the subscriber identity of the subscriber terminal. The radio link is controlled on the basis of signalling parameters communicated between the subscriber terminal and the infrastructure, the radio link being requested by the subscriber terminal. The sub-terminal also includes a proximity signalling unit configured to communicate at least

some of the signalling parameters between the subscriber terminal and the sub-terminal over a proximity wireless interface.

Claim 18, upon which claims 19-21 and 29 depend, recites a radio resource control system for controlling radio resources in a wireless telecommunications system. The radio resource control system includes access control unit configured to control access of at least one sub-terminal to an infrastructure of the wireless telecommunications system on the basis of an access request from a subscriber terminal of the wireless telecommunications system. The subscriber terminal is connected to the infrastructure and the subscriber terminal holds the subscriber identity in the wireless telecommunications system. The radio resource control system also includes a controlling unit connected to the access control means, configured to control a radio link directed from the infrastructure to at least one sub-terminal, the radio link being controlled on the basis of signalling parameters. The radio resource control system also a signaling unit configured to communicate at least one of the signalling parameters between the infrastructure and the subscriber terminal, the at least one of the signalling parameters being communicated between the subscriber terminal and the at least one sub-terminal over a proximity wireless interface.

As outlined below, Applicants submit that Carlsson does not teach or suggest the elements of the presently pending claims.

Carlsson discloses a way in which subscriber identity information in a memory stored within a device, such as a mobile terminal, can be remotely used by a second

independent device. In the case of a GSM terminal, for example, one terminal would be able to utilize the subscriber identity information contained in the SIM of another terminal by establishing a local communication link between the two terminals. The communication terminal, which is using the remote subscriber identity information from an independent device receives a command to use the remote subscriber identity information. This initial command can be entered by a user using the normal input/output (I/O) capabilities of the communication terminal, or it could be a command received over a communication link from the independent device which is going to supply the remote subscriber identity information. A local communication link is established between the two devices. Remote subscriber identity information is received over the local communication link and the communication terminal, which is using the remote subscriber identity information can register with the network using that information. See Col. 1, lines 41 to 61.

Figures 1A and 1B illustrate the overall method of Carlsson. At step 101, a user decides to use the remote SIM function. The user enters a command through the I/O interface of the mobile station or other terminal at step 102. At step 108, the other mobile station or terminal, which is to supply the remote subscriber identity information, receives a command to supply the information. This command could be received from a user via the I/O of the supplying device. Alternatively, the supplying mobile station could receive some type of command from the using station, specifically requesting the use of the remote subscriber identity information. At step 110, a check is made to

determine if the supplying mobile station is registered with the network. If so, it will be necessary for the supplying mobile station to de-register at step 112. This de-registration is necessary because the network prohibits two stations with the same subscriber identity from being registered on the network at the same time. Currently, wireless systems are set up with this prohibition to prevent unlawful or illegitimate use of subscriber accounts.

Applicants submit that Carlsson fails to teach or suggest each of the features recited in the pending claims. All of claims 1-21, 23, 25, 17, and 29, in part, recites that a radio link is requested from the subscriber terminal, the radio link being directed from the infrastructure to the at least one sub-terminal. Carlsson is directed to transferring subscriber identity from one mobile station to another over a local communication link in order to reduce the need for transferring the SIM card physically between the two mobile stations. Otherwise, in Carlsson, the two mobile stations are independent. Carlsson also discloses the need for de-registration of the supplying device. This indicates that the supplying device of Carlsson is not capable of requesting a radio link for the using station, wherein the radio link is directed from the infrastructure to the using station, as recited in the presently pending claims. As is indicated in the cited passage of Carlsson, the de-registration is necessary because the network prohibits two stations with the same subscriber identity from being registered on the network at the same time.

Furthermore, all of claims 1-21, 23, 25, 17, and 29 recite that at least one of the signalling parameters is communicated between the sub-terminal and the infrastructure via the subscriber terminal. Due to the de-registration of the supplying device, in

Carlsson, communicating signalling parameters between a “using” station and infrastructure via a “supplying” device is not possible. Carlsson implicitly indicates that once the subscriber identity information is transferred to the using station, the using station operates independently of the supplying device. Therefore, the supplying device, in Carlsson, is not capable of requesting a radio link from the subscriber terminal, the radio link being directed from the infrastructure to the at least one sub-terminal. Therefore, Carlsson fails to that a radio link is requested from the subscriber terminal, the radio link being directed from the infrastructure to the at least one sub-terminal and at least one of the signalling parameters is communicated between the sub-terminal and the infrastructure via the subscriber terminal, as recited in claims 1-21, 23, 25, 17 and 29. Based and these differences between the presently pending claims and Carlsson, Applicants respectfully assert that the rejections under 35 U.S.C. 102(e) should be withdrawn because Carlsson fails to teach or suggest each feature of claims 1-21, 23, 25 17 and 29.

Claims 22, 24, 26 and 28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Carlsson in view of U.S. Patent Publication No. 2004/0048678 to De Torbal (hereinafter De Torbal). According to the Office Action, Carlsson teaches all of the elements of claims 22, 24, 26 and 28 except for generating a handover request in the subscriber terminal and performing simultaneous handovers of multiple subscribers. Therefore, the Office Action combined Carlsson and De Torbal to yield all of the elements of claims 22, 24, 26, and 28. The rejection is traversed as being based on

references that fail to teach or suggest the combination of features recited in claims 1, 6, 11 and 13, upon which claims 22, 24, 26 and 28 depend.

Each of claims 1, 6, 11 and 13 has been discussed above. Carlsson has also been discussed above. De Torbal discloses that advance handover notice is given to a "target" base station of a group of mobile radio connections that will be soon be handed over to the target base station from a current, "serving" base station. This advance notice permits the target base station to reserve resources and prepare for the handovers of the mobile radio connections. In addition, the handover operation is initiated earlier than it would be otherwise. See at least the Abstract.

De Torbal does not cure any of the deficiencies of Carlsson as outlined above. Specifically, De Torbal does not teach or suggest that a radio link is requested from the subscriber terminal, the radio link being directed from the infrastructure to the at least one sub-terminal and at least one of the signalling parameters is communicated between the sub-terminal and the infrastructure via the subscriber terminal, as recited in claims 1, 6, 11 and 13, upon which claims 22, 24, 26 and 28 depend. Therefore, Applicants respectfully assert that the rejections under 35 U.S.C. 103(a) should be withdrawn because neither Carlsson nor De Torbal teaches or suggests each feature of claims 1, 6, 11 and 13, and hence dependent claims 22, 24, 26 and 28 thereon.

Accordingly, Applicants respectfully submit that claims 1-29 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office



Action. It is therefore respectfully requested that all of claims 1-29 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



---

Arlene P. Neal

Registration No. 43,828

**Customer No. 32294**  
SQUIRE, SANDERS & DEMPSEY LLP  
14<sup>TH</sup> Floor  
8000 Towers Crescent Drive  
Tysons Corner, Virginia 22182-2700  
Telephone: 703-720-7800  
Fax: 703-720-7802

APN:kmp:jf